

175013

 **BELLSOUTH** SA.

BellSouth Telecommunications, Inc.  
Legal Department  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

August 8, 2005

8/8/05  
tod

RECEIVED

AUG 08 2005

PSC SC  
DOCKETING DEPT.

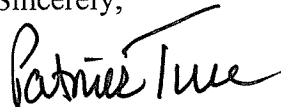
Mr. Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Petition to Establish Generic Docket to Consider Amendments to Interconnection  
Agreements Resulting From Changes of Law  
Docket No.: 2004-316-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of Andrew D. Shore in the above-referenced matter. By copy of this letter, I am serving the same on all parties of record.

Sincerely,



Patrick W. Turner

PWT/nml  
Enclosures  
cc: All Parties of Record  
DM5 # 593937

RETURN DATE: N/A  
SERVICE: tod

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In Re:

Petition to Establish Generic Docket to  
Consider Amendments to Interconnection  
Agreements Resulting From Changes of Law


Docket No. 2004-316-C

**MOTION FOR ADMISSION PRO HAC VICE**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully moves the Public Service Commission of South Carolina ("the Commission") to permit Andrew D. Shore, to practice pro hac vice before the Commission in the above-referenced matter. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Shore, together with the undersigned counsel of record, have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina. Exhibit A to this Motion is a file-stamped copy of that application, along with a Certificate of Service indicating that the application and the \$100 filing fee have been filed with the Supreme Court.

Respectfully submitted, this 8<sup>th</sup> day of August 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.



PATRICK W. TURNER  
Suite 5200  
1600 Williams Street  
Columbia, South Carolina 29201  
(803) 401-2900

FILED  
2015 JUN -8 PM 2:44  
CLERK OF COURT  
JULIA A. HARRIS

# EXHIBIT A

**BellSouth Telecommunications, Inc.**  
**Legal Department**  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

patrick.turner@bellsouth.com

**Patrick W. Turner**  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

August 8, 2005

**RECEIVED**

AUG 08 2005

S.C. SUPREME COURT

Ms. Gail Watts  
Deputy Clerk for Admissions  
South Carolina Supreme Court of Bar Admissions  
Post Office Box 11330  
Columbia, South Carolina 29211

Re: Petition to Establish Generic Docket to Consider Amendments to  
Interconnection Agreements Resulting From Changes of Law  
Docket No.: 2004-316-C

Dear Ms. Watts:

Pursuant to Rule 404 of the S.C.A.C.R., enclosed for filing are the original and one copy of BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of Andrew D. Shore in the above-referenced matter with the requested filing fee of \$100.00.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Patrick W. Turner

PWT/nml  
Enclosures  
DM5 # 593932

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In Re:	)	
	)	Docket No. 2004-316-C
Petition to Establish Generic Docket to	)	
Consider Amendments to Interconnection	)	
Agreements Resulting From Changes of Law	)	
_____	)	

Comes now Andrew D. Shore, applicant herein, and respectfully represents the following:

1. Applicant is an employee of BellSouth Telecommunications, Inc., 675 West Peachtree Street, NE, Atlanta, Fulton County, Georgia, 30375, Telephone Number 404-335-0765, Fax Number 404-614-4054, as in-house counsel.

2. Applicant has been retained personally or as a member of the above named law firm to provide legal representation in connection with the above case now pending before named court of the State of South Carolina.

3. Since August 20 of 1993, applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of North Carolina. Attached is a certificate of good standing.

4. Applicant has been admitted to practice before the following courts:

Court:	Date Admitted:
North Carolina State Bar	08/20/1993

5. Applicant presently is not subject to any suspension or disbarment proceedings,  
( and has not been formally notified of any complaints pending before a disciplinary agency.

6. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.

7. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked.

8. Local counsel of record associated with applicant in this case is Patrick W. Turner of BellSouth Telecommunications, Inc., Suite 5200, 1600 Williams Street, Richland County, Columbia, South Carolina, 29201, Telephone Number (803) 401-2900.

9. Applicant has previously appeared *pro hac vice* in South Carolina in two proceedings since 2001.

10. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

11. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 18<sup>th</sup> day of July, 2005

Andru J. Stone  
APPLICANT

**VERIFICATION**

STATE OF GEORGIA           )  
  )  
COUNTY OF FULTON        )

I, Andrew D. Shore, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Andrew D. Shore  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 18<sup>TH</sup> day of July, 2005

Brenda S. Slaughter

Notary Public for the State of GEORGIA

My Commission Expires: Brenda S. Slaughter  
Notary Public, Rockdale County, Georgia  
My Commission Expires July 29, 2006

### LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 8<sup>th</sup> day of August, 20 05.



---

LOCAL COUNSEL OF RECORD

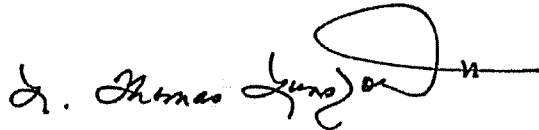


# The North Carolina State Bar

I, L. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby certify that Andrew D. Shore (#20130) is an active member of the North Carolina State Bar in good standing as of this date, and was duly licensed to practice law in this state on August 20, 1993.

I further certify that as of this date the above named attorney has not been subject to any public disciplinary action by the North Carolina State Bar.

Given over my hand and the Seal of the North Carolina State Bar, this 25<sup>th</sup> day of July, 2005.

A handwritten signature in cursive script, reading "L. Thomas Lunsford, II", followed by a horizontal line.

Secretary of the North Carolina State Bar

### CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by **hand delivery** mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$100 filing fee payable to the South Carolina Supreme Court on this 8<sup>th</sup> day of August, 2005.

A handwritten signature in cursive script, appearing to read "Andrew J. Stone", is written over a horizontal line.

APPLICANT/ AFFIANT

STATE OF SOUTH CAROLINA                    )  
  )        CERTIFICATE OF SERVICE  
COUNTY OF RICHLAND                        )

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of Andrew D. Shore in Docket No. 2004-316-C to be served upon the following this August 8, 2005.

Florence P. Belser, Esquire  
General Counsel  
Post Office Box 11263  
Columbia, South Carolina 29211  
(Office of Regulatory Staff)  
**(U. S. Mail and Electronic Mail)**

Jocelyn G. Boyd, Esquire  
Staff Attorney  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

F. David Butler, Esquire  
Senior Counsel  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

Joseph Melchers  
Chief Counsel  
S.C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U.S. Mail and Electronic Mail)**

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte  
1310 Gadsden Street  
Columbia, South Carolina 29211  
(ITC^Delta Com Communications, Inc.)  
**(U. S. Mail and Electronic Mail)**

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(SCTC)  
**(U. S. Mail and Electronic Mail)**

William Atkinson, Esquire  
Attorney, State Regulatory  
3065 Cumberland Circle  
Mailstop GAATLD0602  
Atlanta, Georgia 30339  
(United Telephone Company of the Carolinas and  
Sprint Communications Company, L.P.)  
**(U. S. Mail and Electronic Mail)**

Russell B. Shetterly, Esquire  
P. O. Box 8207  
Columbia, South Carolina 29202  
(Knology of Charleston and Knology of  
South Carolina, Inc.)  
**(U. S. Mail and Electronic Mail)**

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
1200 Main Street, 6th Floor  
Post Office Box 12399  
Columbia, South Carolina 29211  
(MCI WorldCom Network Service, Inc.  
MCI WorldCom Communications and  
MCI metro Access Transmission Services, Inc.)  
**(U. S. Mail and Electronic Mail)**

John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, P.A.  
Post Office Box 2285  
Columbia, South Carolina 29202  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Marsha A. Ward, Esquire  
Kennard B. Woods, Esquire  
MCI WorldCom, Inc.  
Law and Public Policy  
6 Concourse Parkway, Suite 3200  
Atlanta, Georgia 30328  
(MCI)  
**(U. S. Mail and Electronic Mail)**

Frank R. Ellerbe, Esquire  
Bonnie D. Shealy, Esquire  
Robinson, McFadden & Moore, P.C.  
1901 Main Street, Suite 1200  
Post Office Box 944  
Columbia, South Carolina 29202  
(South Carolina Cable Television Association)  
**(U. S. Mail and Electronic Mail)**

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, South Carolina 29205  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Marty Bocock, Esquire  
Director of Regulatory Affairs  
1122 Lady Street, Suite 1050  
Columbia, South Carolina 29201  
(Sprint/United Telephone Company)  
**(U. S. Mail and Electronic Mail)**

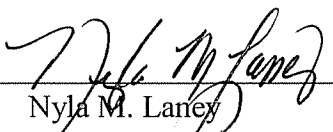
Bonnie D. Shealy, Esquire  
Robinson McFadden & Moore, P. C.  
1901 Main Street, Suite 1200  
P. O. Box 944  
Columbia, South Carolina 29202  
(US LEC of South Carolina)  
**(U. S. Mail and Electronic Mail)**

Andrew O. Isar  
Director – State Affairs  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335  
(ASCENT)  
**(U. S. Mail and Electronic Mail)**

Nanette Edwards, Esquire  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, Alabama 25802  
**(U. S. Mail and Electronic Mail)**

Henry Campen, Esquire  
Parker, Poe, Adams & Bernstein, L.L.P.  
150 Fayetteville Street Mall, Suite 1400  
Raleigh, North Carolina 27601  
(US LEC of South Carolina)  
**(U. S. Mail and Electronic Mail)**

Glenn S. Richards, Esquire  
Shaw Pittman LLP  
2300 N. Street, NW  
Washington, DC 20037  
(AmeriMex Communications Corp.)  
**(U. S. Mail and Electronic Mail)**

  
\_\_\_\_\_  
Nyla M. Laney